



reply to Plaintiffs' responses is February 19, 2025.

The parties request a short, three-week extension of the submission date for the Motions, inclusive of Plaintiffs' deadline to respond to the Motions, and Defendant's subsequent reply briefs as follows:

**Submission Date: March 5, 2025**

**Plaintiffs' Response Date: March 5, 2025**

**Defendant's Reply Date: March 28, 2025**

The extensions requested herein have been agreed to by the parties. This is the first requested extension by either of the parties in connection with the Motions' submission date and attendant briefing schedule.

This requested extension is made in good faith, not for purposes of delay, and will not prejudice either party or adversely impact any other current case deadlines.

**WHEREFORE, PREMISES CONSIDERED**, the parties respectfully request that the Court grant this agreed motion and extend the submission date for the Motions to March 5, 2025, Plaintiffs' deadline to respond to the Motions up to and including March 5, 2025, and Defendant's deadline to reply to Plaintiffs' responses up to and including March 28, 2025.

Respectfully submitted this the 4<sup>th</sup> day of February 2025.

By: s/ Stephen W. Abbott

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**CERTIFICATE OF CONFERENCE**

To the extent this certificate is necessary, the undersigned hereby certifies that on February 4, 2025, counsel conferred by email and agreed to the requested extension of deadlines set forth in the instant motion.

s/ Stephen W. Abbott  
Stephen W. Abbott

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on February 4, 2025, a true and correct copy of the foregoing was served electronically via the CM/ECF system in accordance with the Federal Rules of Civil Procedure.

s/ Stephen W. Abbott  
Stephen W. Abbott